

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**ELINOR HELMININACK and MARK
HELMININACK,**

CIVIL DIVISION

Civil Action No: 08-00573

Plaintiffs,

vs.

**THE HONORABLE NORA BARRY
FISCHER**

**CHRISTOPHER M. RANIERI, P.A.,
CHRISTOPHER M. RANIERI,
individually, UNITED STATES CREDIT
AGENCY, LLC, DOUGLAS J.
MacKINNON and MARK F. BOHN,**

ELECTRONICALLY FILED

Defendants.

SUGGESTION OF BANKRUPTCY

AND NOW, come Defendant, United States Credit Agency, LLC, by and through its counsel, MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN and DANIELLE M. VUGRINOVICH, ESQUIRE, hereby submits this Suggestion of Bankruptcy in the above-referenced matter:

1. On or about November 6, 2008, First American Recovery Services, LLC, an affiliate of United States Credit Agency, LLC, filed a Voluntary Chapter 11 Petition in the United States Bankruptcy Court for the Western District of New York, bearing Bankruptcy case no. 08-14967. *See*, a true and correct copy of the Bankruptcy Petition attached hereto as Exhibit "A."

2. Pursuant to 11 U.S.C. § 362 (a), the filing of a Bankruptcy Petition requires the automatic stay of all judicial proceedings involving the Bankruptcy Claimant.

3. Therefore, the above-captioned civil action is subject to the automatic stay provisions pursuant to 11 U.S.C. § 362 (a) et. seq.

WHEREFORE, Defendant, United States Credit Agency, LLC, respectfully requests that this action be stayed until further proceedings with the Bankruptcy Court.

Respectfully submitted,

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

Date: November 10, 2008

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